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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LISA A. BRYANT,) Civil Case No. 2:20-cv-00594-JAD-EJY

Plaintiff,

v.

MADISON MANAGEMENT SERVICES,
LLC, AND PORRAS, PLLC,

Defendant.

**STIPULATION AND ORDER TO
CONTINUE MOTION TO DISMISS
RESPONSE DEADLINES**

(FIRST REQUEST)

Pursuant to Local Rule 7-1, Plaintiff Lisa A. Bryant ("Plaintiff") and Defendants Madison Management Services, LLC and Porras, PLLC ("Lisa A. Bryant", and together with Defendant, the "Parties"), by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order.

- Plaintiff filed a Complaint (the "Complaint") in this Court on March 27, 2020;
- Defendants filed its Motion to Dismiss on May 20, 2020; and
- Plaintiff's opposition is currently due on June 3, 2020.

The parties are requesting an extension of at least 30-days. This is the first stipulation for extension of time to file responses to the Motion to Dismiss filed on May 20, 2020. The Plaintiff is

1 requesting the extension due to some recent staff changes at Haines & Krieger, LLC and that certain
2 staff members were temporarily limited by their personal situations that were directly impacted by
3 COVID-19.

4 IT IS HEREBY STIPULATED AND AGREED Plaintiff's deadline to file and serve any point
5 and authorities in response to the motion shall be extended 30-days and shall be due on or before July
6 2, 2020.

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8 IT IS FURTHER STIPULATED AND AGREED Defendant's deadline to file and serve any
9 reply in support of its motion shall be extended by at least 30-days and shall be due on July 9, 2020.

10 Dated: May 29, 2020

Dated: May 29, 2020

11 **HAINES & KRIEGER, LLC**

WALDMAN & PORRAS, PLLC

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13 By: /s/George Haines

By: /s/Nicholas M. Porras

14 George Haines, Esq. NV Bar 9411

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Attorneys for Defendants

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20 **ORDER**

21 IT IS SO ORDERED:

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UNITED STATES DISTRICT JUDGE

Dated: June 3, 2020.